

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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September 23, 2003

Linda M. Discepolo
Director of Rates and Regulation
Aquarion Water Company of Massachusetts
200 Cordwainer Drive, Suite 200
Norwell, MA 02061

Re: Aquarion Water Company, D.T.E. 03-91

Dear Ms. Discepolo:

Enclosed please find the Department of Telecommunications and Energy's first set of information requests to Aquarion Water Company of Massachusetts in the above-captioned matter. Please submit responses on or before Monday, September 29, 2003.

Thank you for your prompt attention to this matter.

Sincerely,

Kevin F. Penders
Hearing Officer

Enc.

cc: Mary L. Cottrell, Secretary
Thomas G. Tumilty, Nixon Peabody LLP

AQUARION WATER COMPANY OF MASSACHUSETTS
D.T.E. 03-91

**FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
AQUARION WATER COMPANY OF MASSACHUSETTS**

INSTRUCTIONS

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Aquarion Water Company of Massachusetts ("Aquarion" or "Company") the following Information Requests:

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Aquarion or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

Department's First Set of Information Requests

5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If Commonwealth finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.

REQUESTS

- DTE 1-1 What is the Company's current Accumulated Benefit Obligation? What was the Company's Accumulated Benefit Obligation for calendar year 2002?
- DTE 1-2 What is the Company's current prepaid balance for pensions and post-retirement benefits other than pensions ("PBOP")? What was the Company's prepaid balance for pensions and PBOPs in calendar year 2002?
- DTE 1-3 Please indicate when the Company intends to petition the Department for its next rate case.
- DTE 1-4 Please briefly explain what the mechanism would be that the Company plans to introduce in their next rate case.
- DTE 1-5 Please explain whether the auditors of Deloitte & Touche will allow the deferral of these PBOP assets to be carried indefinitely. If no, detail the time period necessary to address recovery of these assets.